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Attorneys for Mr. Mohamed Miloudi

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(HONORABLE LARRY BURNS)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**MOHAMED MILOUDI,**

Defendant.

CASE NO.: 08cr1197-LAB

DATE: MAY 27, 2008

TIME: 2:00 P.M.

NOTICE OF MOTIONS AND MOTIONS TO:

- 1) COMPEL DISCOVERY AND PRESERVE EVIDENCE; AND
- 2) GRANT LEAVE TO FILE FURTHER MOTIONS.

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND  
REBECCA KANTER, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on May 27, 2008, at 2:00 p.m., or as soon thereafter as counsel may be heard, defendant, Mr. Mohamed Miloudi, by and through his attorneys, Candis Mitchell and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

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**MOTIONS**

Defendant, Mohamed Miloudi, by and through his attorneys, Candis Mitchell and Federal Defenders of San Diego, Inc., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

(1) Compel Discovery and Preserve Evidence;

(2) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: May 2, 2008

s/ Candis Mitchell  
**CANDIS MITCHELL**  
Federal Defenders of San Diego, Inc.  
Attorneys for Mr. Mohamed Miloudi  
Candis\_Mitchell@fd.org